

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE SOFT DRINK)	
INDUSTRY - LOCAL UNION NO. 744)	
PENSION FUND,)	
)	
Plaintiff,)	Case No. 08 C 502
)	
v.)	Judge Leinenweber
)	
ROYAL CROWN BOTTLING COMPANY)	Magistrate Judge Nolan
OF CHICAGO, a Delaware Corporation,)	
)	
Defendant.)	
)	

AFFIDAVIT OF COLIN M. CONNOR

I, Colin M. Connor, being duly sworn on oath, state as follows:

1. I am an attorney at Seyfarth Shaw LLP, 131 S. Dearborn, Suite 2400, Chicago, IL, 60603.
2. I am an attorney for Defendant Royal Crown Bottling Company of Chicago.
3. On July 3, 2008, I, along with Librado Arreola, attorney for Plaintiff, appeared before this Court for status hearing and explained the nature of the case.
4. Plaintiff notified this Court that it intended to file a dispositive motion and the parties agreed that they did not need to take discovery before Plaintiff filed its motion. This Court therefore ordered Plaintiff to submit its summary judgment motion by August 14, 2008, Defendant to submit its response by September 11, 2008 and Plaintiff to reply by September 18, 2008.
5. I specifically advised the Court that, depending on the content of Plaintiff's motion, Defendant may need to take discovery to adequately respond to Plaintiff's summary judgment motion.

6. On August 14, 2008, Plaintiff filed its summary judgment motion and supporting materials. I have reviewed Defendants' motions for summary judgment.

7. At this time, we cannot present facts essential to Defendant's opposition to Plaintiff's motion for summary judgment until Defendant has the opportunity to complete limited discovery.

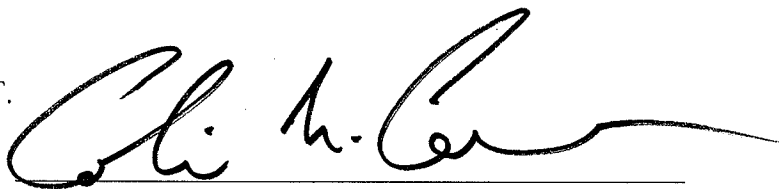
8. For example, Plaintiff argues that summary judgment is warranted, in part, because the deadline to request arbitration was not tolled. Plaintiff also argues that arbitration was not tolled because "the Fund's act of responding could not have induced Royal Crown to miss the deadline..."

9. Defendant cannot respond to that and other arguments until it has had an opportunity to request certain documents from Plaintiff and complete a 30(b)(6) deposition of Plaintiff to determine, among other things, all of Plaintiff's actions (or inactions) which may have caused Royal Crown to miss the deadline to file a demand for arbitration.

10. The requested discovery is necessary for Royal Crown to respond to Plaintiff's motion.

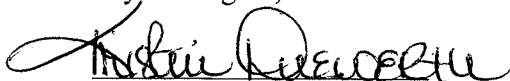
11. Royal Crown proposes that it will serve its document requests within fourteen (14) days of the order granting this motion, take the 30(b)(6) deposition within twenty-one (21) days after receipt of the responses to its document requests and respond to the motion within thirty (30) days thereafter.

FURTHER AFFIANT SAYETH NAUGHT.



Colin M. Connor

Subscribed and sworn to
before me this 21st
day of August, 2008.


Notary Public